

The Honorable James L. Robart

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

AMAZON.COM, INC., a Delaware  
corporation; and AMAZON.COM SERVICES  
LLC, a Delaware limited liability corporation,

Plaintiffs,

v.

JONATHAN G. MORTON, an individual;  
ASIN ENTERPRISE MANAGEMENT  
CONSULTING LTD. CO., a China corporation;  
SHENZHEN LUNA TECHNOLOGY CO.,  
LTD., a China corporation; HUANHUAN  
LIAO, an individual; CHENLIANG ZHONG,  
an individual; GUOLIANG ZHONG, an  
individual; and DOES 1-10,

Defendants.

No. 2:24-cv-01471-JLR

**DECLARATION OF CELESTE  
INGALLS IN SUPPORT OF  
AMAZON'S MOTION FOR ORDER  
APPOINTING INTERNATIONAL  
PROCESS SERVER**

I, Celeste Ingalls, declare as follows:

1. I am presently employed as Director of Operations of Crowe Foreign Services, located at 733 SW Vista Avenue, Portland, Oregon 97205. I specialize in the service of civil process in foreign countries. I am a resident of Oregon; am a citizen of the United States; am over the age of twenty-one; and am neither a party nor an attorney for a party in this action.

2. I have been retained by the law firm, Davis Wright Tremaine LLP ("DWT"), counsel for Plaintiffs Amazon.com, Inc. and Amazon.com Services LLC (collectively

1 “Amazon”) in this action. DWT has asked me to execute service of process upon Defendant  
2 Jonathan G. Morton in Japan.

3 3. The United States and Japan are both signatories to the Hague Convention on the  
4 Service Abroad of Judicial and Extrajudicial Documents in Civil or Commercial Matters (the  
5 “Hague Service Convention”).

6 4. On a frequent and regular basis for more than twenty-eight years, I have prepared,  
7 signed, and forwarded requests for service of process, in accordance with the Hague Service  
8 Convention, from various United States federal and state courts, as well as from courts in Canada  
9 and other territories. I have forwarded such requests for service of process to various countries  
10 and territories that are signatories to the Hague Service Convention, including Japan.

11 5. I have lectured to state and county bar associations, as well as other professional  
12 associations, on the mechanics and requirements of service of process in foreign countries.

13 6. Since 2003, I have attended all the Special Administrative Sessions of the Hague  
14 Conference in The Hague, Netherlands, for the Hague Service Convention as a private expert. At  
15 these sessions, signatory countries are represented by their respective judicial authorities to  
16 discuss their country’s interpretations and practical mechanics of, as well as problems  
17 encountered in dealing with, the Hague Service Convention and its obligations.

18 7. I have participated in a “training” session presided over by the Hague  
19 Administration to provide guidance to a foreign Central Authority and its courts on their  
20 practical obligations with respect to service under the provisions of the Hague Service  
21 Convention. At this session, it was agreed by the Hague Administration that each signatory  
22 country has the discretion to interpret the Hague Service Convention Articles in a way that  
23 conforms to their internal law.

24 8. Article 3 of the Hague Service Convention states “[t]he authority or judicial  
25 officer competent under the law of the State in which the documents originate shall forward to  
26 the Central Authority of the State addressed a request . . . .” I have been informed by Japan’s  
27 Central Authority that in accordance with Japan’s interpretation of Article 3, it will not accept a

1 request pursuant to the Hague Service Convention unless it is signed by the forum court, or by an  
2 officer of the forum court.

3 9. In the alternative, Japan will accept a request pursuant to the Hague Service  
4 Convention signed by an individual other than the forum court or an officer of the forum court, if  
5 said individual has been given authority by the forum court as a competent officer of the court  
6 for the purpose of requesting service in accordance with the Hague Service Convention.

7 10. If the Court issues an order appointing me as an international process server on  
8 behalf of Amazon for service of the Summons and First Amended Complaint ("FAC") on  
9 Defendant Morton, I will forward to the Central Authority in Japan the Order, the Summons,  
10 Civil Cover Sheet, FAC, and Japanese translations thereof, to be served upon Morton in  
11 accordance with the Hague Service Convention.

12 11. Attached as Exhibit A is a true and correct copy of an order from a court in the  
13 Western District of Texas, dated June 2, 2021, in the case titled, *Metro Equip. & Rental Co. v.*  
14 *Tsurumi Mfg. Co., et. al.*, No. PE:21-CV-30-DC-DF, Dkt. 6, in which the court appointed me as  
15 an officer of the court to effect service on a defendant in Japan pursuant to the Hague Service  
16 Convention.

17  
18 I declare under penalty of perjury under the laws of the State of Washington that the  
19 foregoing is true and correct to the best of my knowledge.

20  
21 DATED this 3<sup>rd</sup> day of December, 2024 at Portland, Oregon.

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23   
24 Celeste Ingalls